

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

LAS MARTAS, INC.

Debtor.

CASE NO. 22-02380 (ESL)

CHAPTER 12

**MOTION FOR LEAVE TO REPLY TO DEBTOR'S "RESPONSE IN OPPOSITION TO "URGENT MOTION STAYING ANY REDIRECTION, WITHHOLDING OR DISTRIBUTION OF MILK SALE PROCEEDS DURING THE PENDENCY OF CONDADO'S APPEAL AND FOR CONSIGNMENT OF PROCEEDS PENDING RESOLUTION OF THE APPEAL" AND FOR EXTENSION OF TIME**

(Related ECF No. 213)

TO THE HONORABLE COURT:

COMES NOW secured creditor Condado 5, LLC ("Condado"), through the undersigned counsel, and respectfully moves the Court for an order granting it leave to reply to the *Response in Opposition to Urgent Motion Staying Any Redirection, Withholding or Distribution of Milk Sale Proceeds During the Pendency of Condado's Appeal and for Consignment of Proceeds Pending Resolution of the Appeal* (ECF No. 213) pursuant to PR L. Civ. R. 7(c), and in support hereof, states:

1. On June 24, 2025, Condado filed an *Urgent Motion Staying Any Redirection, Withholding or Distribution of Milk Sale Proceeds During the Pendency of Condado's Appeal and for Consignment of Proceeds Pending Resolution of the Appeal* (the "Urgent Motion", ECF No. 202).

2. On June 25, 2025, the Court entered an *Order* for the Debtor and parties in interest to file a response to the *Urgent Motion* on or before July 2, 2025 (ECF No. 205).

3. On July 2, 2025, the Debtor filed a *Response in Opposition to Urgent Motion Staying Any Redirection, Withholding or Distribution of Milk Sale Proceeds During the Pendency of Condado's Appeal and for Consignment of Proceeds Pending Resolution of the Appeal* (the "Opposition", ECF No. 213). No other party in interest filed a response.

4. Pursuant to PR L. Civ. R. 7(c), Condado requests leave to reply to the Debtor's *Opposition* (ECF No. 213) or otherwise plead within 8 days, through and including Friday, July 11, 2025.

5. Condado's reply will be limited to the averments made by the Debtor in its *Opposition*.

6. This request is made in good faith and for a good cause.

WHEREFORE, Condado respectfully prays the Court to grant it leave to reply to the Debtor's *Opposition* (ECF No. 213) or otherwise plead within 8 days, through and including **Friday, July 11, 2025**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 7th day of July, 2025.

This motion does not require objection notice pursuant to PR LBR 9013-1(c)(3)(B).

Certificate of Service

We hereby certify on this same date, we electronically filed the foregoing with the Clerk of the Court using the Next Gen CM/ECF system, which will send notification of such filing to all Next Gen CM/ECF participants in this case, including the Debtor's counsel, the Chapter 12 Trustee, the U.S. Trustee for Region 21, and all parties that requested notice. Motions and orders processed through CM/ECF are "presumed to be served on the same date of the electronic filing". P.R. Elec. Power Auth. v. Vitol, Inc., 298 F.R.D. 23, 26 (D.P.R.2014).

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